Verification, Updates, and Corrections



Because students sometimes make errors on their application, there is a process for verifying applications and making corrections. The Central Processing System (CPS) selects which applications are to be verified, but you also have the authority to verify additional students.

You must verify applications selected by the CPS of students who will receive or have received subsidized student financial assistance, as defined in the margin. Verification is not required for students who are only eligible for unsubsidized student financial assistance (however, see *Verification exclusions* later in this chapter for an important caveat). While graduate students are ineligible for most types of subsidized Title IV aid, they are eligible for Federal Work Study and would need to complete verification if they are selected and receive that aid. Students who are eligible for both subsidized and unsubsidized Title IV aid may not avoid verification by accepting only unsubsidized aid; they must complete verification to receive any Title IV aid. However, see the relevant margin note on page 92.

REQUIRED POLICIES AND PROCEDURES

Your school must have written policies about

- the time period in which students must submit verification documentation,
- the consequences for failing to submit those documents in time,
- the method you will use to notify students if their EFC and Title IV aid amounts change,
- the procedures you or students will follow to correct FAFSA data,
- the procedure you will follow to refer a student to the Office of Inspector General (OIG) (see *Chapter 5*).

Your school must provide, in a timely manner, students selected for verification a clear explanation of their role, including what documents they must submit, the deadlines they must meet, and the consequences of failing to meet them.

You must complete verification for a selected student before you exercise professional judgment (PJ) to adjust any values that are used to calculate the EFC. But making a PJ adjustment does not require you to verify an application that isn't selected.

Verification regulations

34 CFR 668.51-61

Definitions

34 CFR 668.52

Subsidized student financial assistance programs—Title IV programs for which eligibility is determined by the EFC. These include the Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work-Study (FWS), and Direct Subsidized Loan programs.

Unsubsidized student financial assistance programs—Title IV programs for which eligibility is not based on the EFC. These include the Teacher Education Assistance for College and Higher Education (TEACH) Grant, Direct Unsubsidized Loan, and Direct PLUS Loan programs.

The Iraq and Afghanistan Service Grant is a non-need-based grant and is not subject to verification.

Policies and procedures 34 CFR 668.53

FSA HB June 2019

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Verification items for 2019–2020 34 CFR 668.56

The verification items for 2019–2020 are the same as last year's:

- Adjusted gross income (AGI)
- U.S. income tax paid
- · Education credits
- Untaxed IRA distributions
- Untaxed pensions
- IRA deductions and payments
- Tax-exempt interest
- · Income earned from work
- Household size
- Number in college
- High school completion status
- Identity/statement of educational purpose

See the March 28, 2018, Federal Register.

Changing tracking groups

A student may move from Verification Tracking Group V1 or V4 to group V5 based on corrections made to her CPS record or on other information available to the Department. If verification was already completed for the previous group, the student is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the student only needs to verify the V5 information.

No disbursements of Title IV aid may be made until the V5 verification is satisfactorily completed. If the applicant doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The applicant is liable for the full amount because without verification there is no evidence she was eligible for that aid. See the electronic announcement of October 31, 2016, for more information about disbursements and potential return of funds when students are selected for verification.

APPLICATIONS AND INFORMATION TO BE VERIFIED

The Department's long-term goal is for a customized approach to verification. A menu of potential verification items for each award year will be published in the *Federal Register*, and the items to verify for a given application will be selected from that menu and indicated on the student's output documents. Output documents will continue to include only one verification flag to show students who were selected, and they will need to verify all the FAFSA items shown in the margin that apply to them.

The verification flag will have a value of "Y," and next to the EFC will be an asterisk referring to a comment in the student section of the SAR that tells applicants they will be asked by their schools to provide documentation. A verification tracking flag will be set on the applicant's Institutional Student Information Record (ISIR) to indicate placement in one of the 2019–2020 verification tracking groups.

In some cases you, not the CPS, will select a student for verification. You must verify any information you have reason to believe is incorrect on an application. Also, you may at your discretion require a student to verify any FAFSA information and provide reasonable documentation according to consistently applied school policies. In either case you may, but are not required to, include any of the CPS verification items not already included. Whether you do that or not, students with these applications are considered selected for verification and, as with CPS-selected applications, all other verification requirements, such as deadlines, allowable tolerances, and interim disbursement rules, apply.

Verification tracking groups

Students who are selected for verification will be placed in one of the following groups to determine which FAFSA information must be verified.

V1—Standard Verification Group. Students in this group must verify the following if they are tax filers:

- Adjusted gross income
- U.S. income tax paid
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax-exempt interest income
- Education credits
- Household size
- Number in college

Students who are not tax filers must verify the following:

- Income earned from work
- Household size
- Number in college

- V2—Reserved for future use by the Department.
- V3—Reserved for future use by the Department.

V4—Custom Verification Group. Students must verify high school completion status and identity/statement of educational purpose.

V5—Aggregate Verification Group. Students must verify high school completion status and identity/statement of educational purpose (SEP) in addition to the items in the Standard Verification Group.

V6—Reserved for future use by the Department.

Reporting results for groups V4 and V5

You must report the verification results of identity and high school (HS) completion status for any student for whom you receive an ISIR with tracking flag V4 or V5—as selected by the CPS, not your school—and request verification documentation. You report this information on the FAA Access to CPS Online website: select the Identity Verification Results option from the main menu, enter your school identifiers, the year, and the student identifiers. You will then enter one of the following numeric codes that most applies:

- 1—Verification completed in person, no issues found
- 2—Verification completed using notary, no issues found
- 3—Verification attempted, issues found with identity. (You received acceptable documentation of high school completion, but you did not receive the SEP or documentation of identity or the latter was unacceptable.)
- 4—Verification attempted, issues found with HS completion. (You received the SEP and acceptable documentation of identity, but you didn't get HS completion documentation or it was unacceptable.)
- 5—No response from applicant or unable to locate
- 6—Verification attempted, issues found with both identity and HS completion

You should report results no more than 60 days following your first request to the student for documentation of identity and high school completion. Inaccurate and untimely reporting may subject your school to findings as a result of your annual compliance audit or a program review. You should not wait until the award year ends before reporting these results. If there is a change in a result you have already submitted, you can submit the new code using the above process, and you should make that change within 30 days.

Because the FAA Access website does not store a list of these verification results for you to retrieve, we recommend you print and keep the confirmation page for your records. Instead of using this individual method, you can submit verification results by uploading a flat file with the data for up to 2.000 students.

FSA Assessments

You can use the <u>verification activities</u> that are part of the FSA Assessments to help you evaluate your verification process.

Verification questions/answers

The Department has a list of questions and answers about verification online. See www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html.

Verification following disasters

Dear Colleague Letter GEN-17-08 gives general guidance for when federallydeclared disasters affect the awarding of aid. The DCL states that the Secretary will not enforce the verification requirements during the award year for applicants whose records were lost or destroyed because of a disaster as long as the school has tried to preserve and reconstruct any records. The school must document when it does not perform verification for this reason and use status code "S" when reporting the disbursement of Pell Grants to affected students. Also, the requirement for dependent students to submit a statement signed by a parent regarding household size and number in college is waived if the parents cannot provide the signature due to the disaster. The school must note why no parent was able to provide the statement.

The relief described in the DCL and its attachment applies specifically to disasters and is separate from relief provided under the Higher Education Relief Opportunities for Students (HEROES) Act, which is cited in the margin on the next page. Also, schools that experience a local disaster (rather than a federally declared one) that affects Title IV administration should consult their regional school participation division.

Verification exclusions

34 CFR 668.54(b)

HEROES Act modifications

The HEROES Act allows the Secretary to modify or waive some statutory and regulatory requirements for those who

- are serving on active duty or performing qualifying National Guard duty during a war, other military operation, or national emergency;
- reside or are employed in an area declared a disaster by a federal, state, or local official in connection with a national emergency; or
- suffered economic hardship as a direct result of a war, other military operation, or national emergency, as determined by the Secretary.

Read the <u>electronic announcement</u>, and read the <u>Federal Register notice</u> for the waivers and modifications, which are due to expire on September 30, 2022.

Spouse unavailable example

Ursula is attending Lem Community College, and her application is selected for verification. She provided her husband's information on the application but now explains that her husband has recently moved out, and she can't locate him. Ursula also gives Lem some documents to show that she's tried to locate her husband. Lem determines that Ursula doesn't need to provide verification of her husband's tax and income information, but she still needs to verify her own information.

Verification exclusions

There are times when you don't need to verify a student's application. Except in the case of the student's death, however—or post-enrollment situations where the student also does not intend to reenroll—none of the exemptions excuse you from the requirement to resolve conflicting information (see *Chapter 5*). You should document the basis for an exclusion. Other information not excluded must still be verified according to all other requirements. You don't have to verify FAFSA information of a student in the following situations:

- Death of the student. You don't have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student's beneficiaries. You cannot originate or disburse his Direct Subsidized Loan or consider any interim disbursement you made of Pell or FSEOG funds or provisional FWS employment to be an overpayment. See *Chapter 2* of *Volume 5*.
- Not an aid recipient. The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.
- The applicant is eligible to receive only unsubsidized student financial assistance. However, students selected for V4 or V5 verification should complete it in accord with the answer to DOC-Q18 on the verification Q and A page.
- Applicant verified by another school. The student completed verification for the current award year at another school before transferring. Her FAFSA data must be the same as it was at the previous school, and you must get a letter from that school stating that it verified her application and providing the transaction number of the pertinent valid ISIR.
- Post enrollment. The student was selected for verification **after** ceasing to be enrolled at your school, she does not intend to reenroll for the award year, and no further (including late) disbursements will be made.

Unless you have reason to believe it is inaccurate, you don't have to verify the reported FAFSA information of the parents of a dependent student if any of the following apply (including in cases where there is only one parent):

- Both of the parents are mentally incapacitated.
- Both parents or the custodial parent has died.
- They are residing in a country other than the United States and can't be contacted by normal means.
- They can't be located because the student does not have and cannot get their contact information.

Unless you have reason to believe it is inaccurate, you don't have to verify the reported FAFSA information of the spouse of an independent student if any of the following apply:

- The spouse has died.
- He is mentally incapacitated.
- He is residing in a country other than the United States and can't be contacted by normal means.
- He can't be located because the student does not have and cannot get his contact information.

DOCUMENTATION

The documentation you will need for verification varies according to the item verified, as explained in this section. The Department encourages students and parents to use the IRS Data Retrieval Tool (DRT) to import data from their tax return and not change it. It is the fastest, easiest, and most secure method of meeting verification requirements. Also, this chapter includes suggested text developed by the Department, which you can use to create an institutional verification document if you choose and to verify non-tax items, such as household size and number in college. The text is also available on the IFAP website at https://ifap.ed.gov.

If you use a verification document, be sure that it is signed, that all required sections are completed, and that any relevant tax or alternative documents are attached. Copies are acceptable, and unless specifically noted in this chapter, a signature on a copy is as valid as an original signature (i.e., a handwritten or "wet" signature). If a copy of the tax return is used, the filer (or at least one of the filers of a joint return) must sign it or the tax preparer must provide his name and SSN, EIN, or PTIN.

The chart below shows the tax form line numbers for the most commonly reported items. This chart is a reference only; it is not a list of all the items the school must check on a tax return.

Documenting AGI, taxes paid, and other tax data with the DRT

As already noted, the importation of IRS tax data via the DRT is the best way to document that information. Students and parents do this either when initially filling out the FAFSA or later as a correction. For the retrieved data to be acceptable documentation of tax data, it is necessary that neither

Acceptable documentation

The documentation required for verifying 2019–2020 application data is given in the *Federal Register* published on March 28, 2018. See also <u>DCL GEN-18-03</u> for guidance about verifiable information for 2019–2020.

AGI and income tax documentation 34 CFR 668.57(a)

Line items from the 2017 tax return				
	1040	1040A	1040EZ	
AGI	37	21	4	
Income Tax Paid	56 minus 46	28 minus 36	10	
Deductible IRA/SEP	28 plus 32	17		
Tax-exempt Interest Income	8b	8b		
Untaxed Portions of IRAs and Pensions (excluding rollovers)	15a minus 15b and 16a minus 16b	11a minus 11b and 12a minus 12b		

DRT items

The following items are imported from IRS forms 1040, 1040A, and 1040EZ to a student's FAFSA via the DRT:

- Type of tax return filed
- · Filing status
- · Adjusted gross income
- Taxes paid
- Income earned from work
- Exemptions

In addition, the following are also imported from the 1040 and 1040A forms but not the 1040EZ:

- · Education credits
- IRA deductions
- · Tax-exempt interest income
- Untaxed IRA distributions
- Untaxed pensions

students nor parents change the data after it is transferred from the IRS—if the data was changed or if you have reason to believe the data transferred is incorrect, the student will need to provide a return transcript or a copy of the tax return. The IRS request field(s) on the ISIR will have a value of "02" when the data is unchanged. Under the following conditions, the IRS DRT is **not** available on fafsa.gov (all apply to both students and parents unless otherwise noted):

- The person did not indicate on the FAFSA that the tax return has been completed.
- The marriage date is January 2018 or later.
- The first three digits of the SSN are 666.
- The person filed a non-U.S. tax return.
- The person is married and filed the tax return either as head of household or married but filing a separate return.
- Neither married parent entered a valid SSN.
- An unmarried parent or both married parents entered all zeroes for the SSN.

Using the tax transcript

If students cannot or will not use the DRT, either at initial FAFSA filing or through fafsa.gov corrections, another way to document AGI, taxes paid, and untaxed income is by providing an IRS tax return transcript for the student and spouse or parents, as applicable. Before requesting a transcript, they should allow enough time to pass after filing the return; it takes the IRS 2 to 4 weeks to process returns filed electronically and 6 to 8 weeks for mailed returns. Tax transcripts submitted to your school for verification do not need to be signed by the tax filer (but it is encouraged) unless you have reason to doubt their authenticity.

There are a few ways to request a tax return transcript: online at www. irs.gov, by calling 1-800-908-9946, or by mailing the paper Form 4506T-EZ, which can be printed out from the IRS website. To order a fiscal year tax transcript for verification, Form 4506-T must be used rather than Form 4506T-EZ. Phone requests are via an automated process instead of an IRS representative. With online requests, tax filers can get an electronic transcript (see below) or they can have the IRS mail them a paper transcript, which is how non-online requests are handled. Schools can accept and copy transcripts originally obtained from the IRS.

The Get Transcript Online feature allows users to get the transcript in real time as a portable document format (PDF) file, which they can submit electronically to a school or print and submit as a hard copy. To use the Get Transcript Online tool, users must have (1) access to a valid email address, (2) a text-enabled mobile phone in their name, and (3) specific financial account numbers, such as a credit card number or an account number for a home mortgage or auto loan. The process will not cause charges to the card or the account. See the July 26, 2016, announcement.

Tax transcript matrix

See the June 6, 2018, announcement for a chart of the FAFSA and ISIR tax items used for verification and their corresponding line items from the various IRS tax returns and the tax transcript.

The IRS's Income Verification Express Service (IVES) allows a third party to receive a tax filer's transcript. The IVES participant submits a 4506-T or 4506T-EZ form, signed by the tax filer, and receives the transcript from the IRS, which charges a small fee for the service. Schools may apply to participate in IVES. They may also use a transcript from another IVES participant (which is not considered a third-party servicer in this case) for verification as long as they have no reason to doubt its authenticity. Schools may not, however, pass on the charge for using this service to the student. See GEN-14-05.

As of September 23, 2018, the IRS changed the format of the transcript to combat identity theft. This entails masking much of the personally identifiable information so that, for example, only the last four digits of any SSN or account or telephone number are displayed. In 2019 the option on forms 4506-T and 4506T-EZ to designate a third-party recipient of the transcript will be eliminated. As noted above, schools can elect to participate in IVES as a way of receiving transcripts directly from the IRS. Taxpayers will be able to have a "customer file number" of their choosing appear on a requested transcript, which will facilitate identification. This can be something like a student's college ID number or some other number (but **not** an SSN). See the October 4, 2018, announcement and the IRS news release for more.

Using the tax return

For the remainder of the 2018–2019 award year and all of 2019–2020, students can submit a copy of a tax return to complete verification. See the January 9, 2019, electronic announcement for more information, and see also the guidance under victims of identity theft later in this volume for an important caveat. The tax return will likely have been filed electronically with one of a variety of methods. These include do-it-yourself methods as well as completion by a tax preparer. Each method should permit printing of a paper copy of the return, though the e-file format might not contain every line item, showing instead only the data the tax filer provided. For example, if Item 8a, "Taxable interest income," does not appear on such a return, that means no taxable interest income was reported.

You can also accept an electronic copy of a return that was electronically signed if your school's process for accepting such signatures complies with the Electronic Signatures in Global and National Commerce (ESIGN) Act. But a signature on Form 8879, the IRS e-file Signature Authorization, is not an acceptable substitute for a signature on the tax return.

For persons who have a tax professional prepare their return, instead of a copy of the return with the filer's signature, you may accept one that has the name and PTIN of the preparer or has his SSN or EIN and has been signed, stamped, typed, or printed with his name and address. Note that the IRS requires paid preparers to have a PTIN.

If a person did not retain a copy of her 2017 tax information and it cannot be located by the IRS or the relevant government agency, she must submit a signed statement indicating that she did not keep a copy of her tax information as well as documentation from the taxing authority indicating that that information cannot be located. Also, you must accept for an IRS filer either a copy of Form W–2 for each source of employment income received for 2017 or, if she is self-employed, a signed statement certifying the

IRS documentation requests

See the <u>electronic announcement of</u> <u>February 23, 2017</u>, for information about the documents obtained from the IRS that are used for verification: the tax return transcript, record of account, tax account transcript, and the wage and income transcript. The announcement also explains Form 13873, which students or parents might receive when requesting documents from the IRS.

If a W-2 is not available

If an individual who is required to submit an IRS Form W-2 did not save a copy, she should request a replacement W-2 from the employer who issued the original. A W-2 transcript from the IRS is also acceptable though it generally is not available until the year after the W-2 information is filed with the IRS (e.g., 2019 for 2017 information filed in 2018).

If she is unable to obtain one in a timely manner, you may permit her to provide a signed statement that includes the amount of income earned from work, the source of that income, and the reason why the W-2 is not available in a timely manner.

amount of AGI and taxes paid. For someone who filed an income tax return with a government of a U.S. territory or commonwealth or a foreign central government, accept a copy of a wage and tax statement or a signed statement certifying the amount of AGI and taxes paid for 2017.

Special situations

- Filing extensions. Because the FAFSA uses prior-prior year tax data, even individuals who have an automatic six-month extension by the IRS should have completed their tax return by the time of verification. Therefore, they must verify income and tax information either by using the IRS Data Retrieval Tool or by submitting to the institution an IRS Tax Return Transcript. Only students and parents granted an extension beyond six months may submit the following for verification:
 - a copy of IRS Form 4868, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return;
 - a copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2017;
 - verification of non-filing (see non-tax filers for more information) from the IRS dated on or after October 1, 2018;
 - copies of all their W-2 forms (or equivalent); and
 - if self-employed, a signed statement with the amounts of their AGI and U.S. income tax paid.

You may require those with a filing extension to use the DRT or submit to your school a tax transcript or return after it has been filed. If you do that, you must reverify the income information. If the student fails to use the DRT or submit a tax transcript, see the guidance on page 94 on failing to complete verification. See DOC-Q16 on the Q and A page.

- Filers of joint returns who are no longer married. When dependent students' parents filed a joint return and have separated, divorced, married someone else, or been widowed, the students must submit an IRS tax transcript or return and a copy of each W-2 form for the parent whose tax information is on the FAFSA. Similarly, an independent student must submit a tax transcript or return and a copy of each of her W-2 forms if she filed a joint return and is separated, divorced, or a widow.
- For non-tax filers you must receive a W-2 form for each source of employment income. You must also get a signed statement giving the sources and amounts of the person's income earned from work not on W-2s and certifying that the person has not filed and is not required to file a tax return. Students may sign on a nonfiling spouse's behalf. For residents of the Freely Associated States (the Republic of the Marshall Islands, the Republic of Palau, or the Federated States of Micronesia), a copy of the wage and tax statement from each employer and a signed statement identifying all of the person's income for the year is acceptable. Persons from a U.S. territory or commonwealth or a foreign country who are not required to file a tax return can provide the signed statement certifying their income.

Rollovers and verification

Oualified rollovers from one retirement account to another are not taxable, and they should not be counted as untaxed income (as indicated in Chapter 2). Since neither the DRT nor a tax transcript identifies rollovers, you must get documentation from the tax filer. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript that includes the word "rollover" beside any applicable item, similar to the instruction the IRS gives for Forms 1040 and 1040A. The annotation must be signed and dated by the filer. For those who used the DRT, a signed confirmation that the IRA or pension distribution included a rollover would suffice; a tax transcript would only be needed if other IRS tax information was changed. See VI-Q4 on the Q and A page.

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Using a joint return to figure individual AGI and taxes paid

If the filer of a joint return has become widowed, divorced, or separated since filing the return, it may be necessary to determine the individual's income and taxes paid using the joint return and W-2 forms. If a W-2 is not available (the filer is self-employed for example) or if a duplicate copy from the employer who issued the original W-2 is not available in a timely manner, the school may permit the filer to provide a signed statement that certifies the base year AGI and U.S. taxes paid. If he has divorced and married someone new (see the margin note on page 91 if this occurred after completion of the application), then the new spouse's income and assets would also need to be included.

Add the income amounts from the individual's W-2 forms to any other income that can be extracted from the joint return. Any interest or business income earned on joint accounts or investments should be assessed at 50%. The same procedure should be used to divide business or farm losses. Also, if the AGI listed on the joint return was adjusted, you should reduce the individual's AGI by the portion of the adjustment that applies solely to him or her. For example, if an adjustment was made for moving expenses, which applies to the couple jointly, only 50% of the adjustment amount can be applied against the individual's income. An AGI figure can be calculated for the individual filer. A signed statement from the filer certifying that the data from the joint return were accurately assessed is sufficient documentation for this method.

Use one of the following methods to figure the individual's taxes paid:

- **Tax table (preferred method).** Using the IRS Tax Table or Tax Rate Schedule for the appropriate year, calculate the amount of tax that would have been paid if a separate return had been filed. Use the deduction and number of exemptions the individual could have claimed if he or she had filed a separate return. (If itemized deductions were taken, count only the portion of those deductions that could have been claimed on a separate tax return.)
- **Proportional distribution.** Determine what percentage of the joint AGI was attributable to the individual, and then assess the joint taxes paid by that same percentage.

Example 1: Calculating individual AGI from joint return example

Eddy's application is selected for verification. He and his wife filed a joint return for 2017 and have since separated. The AGI on Eddy's FAFSA matches the AGI of \$53,700 on the 2017 tax return, which means it's wrong because it includes his wife's income.

Eddy's W-2 shows that his income for 2017 was \$23,900, and the tax return shows \$400 in interest. Because it was interest on a joint savings account, the aid administrator adds \$200 of it to Eddy's income and submits \$24,100 as the corrected income via FAA Access.

Example 2: Calculating individual taxes paid from a joint return

The aid administrator determines that Eddy's part of the \$53,700 AGI he and his wife reported is \$24,100. Eddy and his wife claimed four exemptions on their tax return (themselves, one child, and Eddy's nephew). Eddy's wife has custody of the child and will claim him as her dependent when she files her tax return for the next year. Eddy's nephew still lives with him. Therefore, Eddy would have had two exemptions (himself and his nephew) totaling \$8,100. In the new situation, Eddy's filing status is "head of household" instead of "married." Therefore, his standard deduction is \$9,350 (instead of the \$12,700 for married filers). Eddy's income of \$24,100 minus the \$8,100 for exemptions and the \$9,350 standard deduction results in \$6.650 in taxable income.

The aid administrator uses the tax table to determine how much tax Eddy would have paid on this amount, taking into account any applicable credits reported on the original return. With a taxable income of \$6,650, the amount of tax paid from the tax schedule would be \$668.

To use the proportional distribution method instead, the aid administrator figures out what percentage of the joint AGI Eddy's income represents. The percentage is 45% ($24,100 \div 53,700$ is .4488). The aid administrator then multiplies the income tax paid as reported on the tax return (\$2799 for this example) by this percentage. Therefore, Eddy's income tax paid would be \$1,260 ($.45 \times 2799).

"Per computer" amounts

The tax return transcript may show a per computer amount for some tax data that is different from what the filer reported to the IRS. The per computer amount should be used because it corrects mathematic errors and is more accurate than what appears on the original return or was transferred via the DRT. This guidance still holds, but because the DRT reports per computer values for AGI, income tax paid, and education tax credits, there should not be many discrepancies between DRT data and the transcript. Also, if a transcript indicates "recomputed <tax return item> per computer," that amount may be ignored for verification.

Other IRS transcripts

Schools may accept for verification any IRS tax transcript that includes all of the necessary information: adjusted gross income, U.S. income tax paid, untaxed IRA distributions, untaxed pensions, education credits, IRA deductions and tax-exempt interest. Because the record of account transcript and the Return Transcript for Taxpayer (RTFTP) include all of the above information, either may be used for verification. The Information Returns Processing Transcript Request—Wages (IRPTR-W) only provides wage information and therefore can only be used in lieu of a W-2 form.

Verification selection and PJ

Once the Department selects a FAFSA for verification, every subsequent transaction for that award year, even one resulting from PJ, will indicate that the student is selected for verification.

If a FAFSA that is not selected for verification is later corrected, that can result in the application being selected. However, when PJ is used (and coded correctly) to adjust an application that is not selected for verification, the CPS prevents the subsequent transaction from being selected for verification.

You must also require the person (except dependent students) to submit a "Verification of Nonfiling (VNF) Letter" from the IRS dated on or after October 1, 2018, attesting that she did not file a 2017 IRS tax return. She can get this by sending IRS Form 4506-T and checking box 7. Persons subject to foreign tax codes would submit a comparable document; see DOC-Q30 on the Q and A page. Note that verification of nonfiling only shows that a person did not file a tax return, not that she was not required to file one. See *Chapter 5* if a person whose financial information was on the FAFSA did not file a tax return when it appears she was required to, and see DOC-Q29 on the above webpage about non-tax filers who lack any identifying number (e.g., SSN) needed to get a confirmation of nonfiling from the IRS.

- Filers who can't get a VNF letter from the IRS (or other tax authority) may instead submit a signed statement as long as the school has no reason to question the student's or family's good-faith effort to acquire the letter. The statement must assert that the person attempted but was unable to get the VNF. For non-tax filers, the statement must also confirm that they have not filed and are not required to file a tax return for the relevant year, and it must list the sources and amounts of income earned from work. For extension filers, the statement must also confirm that they have not yet filed a return for the tax year and must list the sources and amounts of income; if they are self-employed, it must include the amount of AGI and U.S. income tax paid. Note that in both cases—for non-tax filers and extension filers—the other required documentation (e.g., W-2 forms) must still be provided. See the January 9, 2019, electronic announcement.
- For filers of non-IRS tax returns, you may accept a transcript from a government of a foreign nation or a U.S. territory or commonwealth that has all of the filer's income and tax data to be verified. Or you may accept a copy of the tax return, which must be signed by the filer or one of the filers of a joint return. Use the income and tax data that most closely corresponds to what is on the IRS tax return, and convert monetary amounts into U.S. dollars as appropriate. If you question the accuracy of the information on the signed copy of the return, the filer must provide you with a copy of the tax account information issued by the tax authority. See DOC-Q28 on the Q and A page.
- Filers of amended returns. Students or parents who file an amended return (IRS Form 1040X) can use the DRT though the ISIR will show an IRS Request Flag value of 07 (see page 15). Because the tax return transcript does not reflect changes to the original return by the filer or the IRS, it is by itself not sufficient. So when an amended return was filed, you must submit any changes to nondollar items and to single monetary items of \$25 or more. To complete verification you will need a signed copy of the 1040X form that was filed as well as either
 - IRS DRT information on an ISIR record with all the information from the original tax return or
 - an IRS tax return transcript (which does not have to be signed), any
 other IRS transcript that includes all the income and tax information
 required to be verified, or a copy of the tax return.

Note that there may be rare cases when a student, spouse, or parent did not file a 1040X with the IRS but had their tax and income information amended by the IRS. In such a case a school may accept one of the items mentioned above plus documentation showing the IRS's change(s).

- Victims of identity theft who cannot get a return transcript or use the DRT submit a Tax Return DataBase View (TRDBV) transcript as well as a signed and dated statement indicating that they were victims of tax-related identity theft and that the IRS is aware of it. They do this by calling the IRS's Identity Protection Specialized Unit (IPSU) at 800-908-4490. After the IPSU authenticates the tax filer's identity, she can ask the IRS to mail her the TRDBV transcript, which is an alternate paper transcript that will look different than a regular transcript but that is official and can be used for verification. Unless you doubt its authenticity, you don't need to get an IRS signature or stamp or any other validation. See DCL GEN-14-05 for a sample TRDBV transcript. Those who cannot obtain a TRDBV transcript may instead submit a copy of the tax return or another official IRS transcript or equivalent IRS document if it includes all of the income and tax information required to be verified. Note that filers must first attempt to get a TRDBV before they can use a copy of the tax return or another transcript. Then, as long as the school has no reason to doubt the victim of identity theft or the accuracy of the document, it can be used to complete verification.
- Students eligible for an automatic zero EFC. A dependent student in this category who is placed in Verification Tracking Group V1 or V5 must verify his parents' AGI if they were tax filers and their income earned from work if they were non-tax filers (who must also follow the guidance given for non-filers). He must also verify high school completion status and identity and sign a statement of educational purpose if in group V5. An independent student must verify
 - 1. his and, if applicable, his spouse's AGI if they were tax filers;
 - 2. their income earned from work if they were non-tax filers;
 - 3. his high school completion status and identity and sign a statement of educational purpose if in group V5; and
 - 4. the number of household members to determine if the student has any dependents other than a spouse.

All students eligible for an auto zero EFC who are placed in Verification Tracking Group V4 must verify high school completion status and identity and sign a statement of educational purpose.

Household size

To document the household size, the student needs to provide a statement signed by him and, if dependent, at least one parent that gives the name, age, and relationship to the student of each person in the household.

You don't have to verify household size in the following situations:

 For a dependent student, the household size reported is two with a single, divorced, separated, or widowed parent or is three with parents who are married or are unmarried and living together

Immigrants and tax filing

Immigrants are not exempt from tax filing. The IRS is more concerned whether a person is a resident or nonresident rather than legal or illegal—alien. An alien is anyone who is not a U.S. citizen or national. A resident alien is one who either is a permanent resident or has resided in the U.S. for a specific minimum amount of time (has met the substantial presence test). All others are nonresident aliens. Resident aliens' income is generally subject to tax in the same manner as U.S. citizens', and they file Forms 1040, 1040A, or 1040EZ. Nonresident aliens who are required to file a return submit Form 1040NR or 1040NR-EZ; both forms are acceptable documentation for verification.

Immigrants who do not have an SSN and are unable to get one can apply with the IRS for an individual taxpayer identification number (ITIN). The ITIN is only for tax purposes. It does not authorize a person to work, endorse his legal status, or entitle him to the earned income credit or Social Security benefits. It is not to be used as an identifier in place of the SSN on the FAFSA.

See the IRS's *Publication 519, U.S. Tax Guide for Aliens* at **www.irs.gov** for more information.

Household size documentation 34 CFR 668.57(b)

Number in college documentation

34 CFR 668.57(c)

Refugees and HS completion

In rare instances when a refugee, asylee, or victim of human trafficking cannot obtain documentation of high school completion from her home country, a school may accept self-certification in accordance with the guidance of Q & A FHD-Q2/A2 at

www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html.

ATB alternatives for high school completion

Legislation in 2014 and 2015 provided ability-to-benefit (ATB) alternatives to a high school diploma for students enrolled in a career pathway program on or after July 1, 2014. See <u>DCL GEN-16-09</u> for more information, including a definition of career pathway program and a list of Q's and A's.

Students who were enrolled in a Title IV program prior to July 1, 2012, and were eligible for aid under the old ATB provisions retain their eligibility regardless of whether they are in a career pathway program. See GEN-12-09 regarding the grandfathered ATB provisions, and see the announcement of June 24, 2015, for a current list of approved ATB tests.

For students who establish Title IV eligibility under an ATB alternative, your school should have already obtained or be in the process of obtaining documentation necessary to support his eligibility. Therefore, no further high school completion documentation should be needed from the student.

• For an independent student, the number reported is two if he is married or one if he is single, divorced, separated, or widowed

Keep in mind that household size needs to align with the answers to the relevant dependency status questions, such as the one about having dependents other than a spouse. If verification reveals that answers do not match, the FAFSA needs to be corrected so that they do.

Number in college

You can document this item with a statement signed by the student (and, if she is dependent, at least one parent) that gives the name and age of each person in the household (excluding the parents of a dependent student) who is enrolled at least half time in a degree or certificate program at an eligible college. The statement must also give the name of each college, and it can be written to document household size as well. Completion of the Department's verification suggested text can satisfy both items.

If you have reason to doubt the enrollment information reported, you must obtain from each school a statement that the named person will attend there on at least a half-time basis. You don't have to get such a statement if the person has not yet registered, is attending less than half time, or will be attending your school.

If you have reason to doubt whether a reported school is Title IV eligible, you must insure it is, such as by checking to see if it has a federal school code.

You don't have to verify the number in college if the reported number enrolled is one (the student only).

High school completion

Students must provide one of the following documents that indicate their high school completion status at the beginning of the 2019–2020 year:

- A copy of a high school diploma
- A copy of a final, official high school transcript that shows the date when the diploma was awarded
- A copy of the "secondary school leaving certificate" or similar document from the proper government agency for students who completed secondary school in a foreign country. If your college doesn't have the expertise to evaluate foreign secondary school credentials or chooses not to do so, there are evaluation services available.
- A copy of a General Educational Development (GED) certificate or GED transcript that indicates the student passed the exam
- Certification of a passing score on a test that the student's state authorizes and recognizes as the equivalent of a high school diploma. This includes tests similar to the GED, such as the High School Equivalency Test or the Test Assessing Secondary Completion. Test transcripts are acceptable documentation if they indicate that the final score is a passing score or that the student's state considers the test results to meet its high school equivalency requirements.

- An academic transcript that indicates the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree at any participating school. You do not have to collect proof of high school status for graduate students if admission into their program required the completion of at least two years of undergraduate coursework.
- For a student who has not completed high school and is seeking
 enrollment in a program that leads to at least an associate degree or
 its equivalent, documentation from the high school that he excelled
 academically and from your school that he meets your written policy
 for admitting such students. This should be a rare occurrence.
- For homeschooled students, a copy of a secondary school completion credential for homeschool (other than a high school diploma or its recognized equivalent) if state law requires homeschooled students to get that credential. If it is not required, a transcript or the equivalent signed by the parent or guardian that lists the secondary school courses the student completed and documents the successful completion of a secondary school education in a homeschool setting.
- For students in an "eligible career pathway program," documentation that they passed an approved ATB test or completed at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by your school. See the margin note.

If your school has already received one of these documents as part of the admission process, you do not need to ask for another. If you successfully verified a student's high school completion in a prior year, you do not need to do it again. Some schools collect seventh semester high school transcripts prior to students receiving an actual diploma, or they collect high school transcripts for some but not all of their students because they may have special programs that admit students without a high school diploma. In both cases, schools must collect separate documentation that shows the date when the diploma was awarded.

When documentation of high school completion is unavailable—e.g., the school is closed and no information is available from another source such as the school district or state department of education, or the parent or guardian who homeschooled the student is deceased—you may accept alternative documentation, such as a military *DD Form 214 Certificate of Release or Discharge from Active Duty* that indicates that the student is a high school graduate or equivalent. However, a student's self-certification is not acceptable except in rare instances for refugees, asylees, and victims of human trafficking, as explained in the margin note on page 88.

Identity and statement of educational purpose

Students should appear in person at your school and present a valid, unexpired,* government-issued photo identification (ID) such as a passport or a driver's license or other state-issued ID. You must maintain an annotated copy of that ID that includes the date it was received and the name of the person your school authorized to receive it.** Note that an ID issued by a state university or college is not sufficient for this purpose.

Timing of signature

Any required signatures, such as signatures on worksheets or on copies of tax returns, must be collected at the time of verification—they can't be collected after the verification deadline for that award year.

Electronic signatures

For verification documentation, a school may collect an electronic signature for an applicant, parent, or spouse if the process includes an assurance of the identity of the person signing. This is often accomplished with a PIN or password that is assigned only after the identity of the person receiving the PIN or password has been authenticated.

V4 and V5 reporting

As explained on page 79, schools are required to report through FAA Access the outcomes of verifying high school completion status and identity/statement of educational purpose for applications with tracking flags V4 and V5.

- * The ID just needs to be unexpired at the time it is checked. For proving identity, it does not matter if the ID is due to expire during the award year.
- ** The school may determine which of its staff are authorized to review an applicant's identity. We do recommend that the person(s) be full-time staff and that the school keep a record of who they are.

Updating information

34 CFR 668.55

REAL ID Act of 2005

The REAL ID Act affects people entering certain restricted areas where identification is required: federal facilities, nuclear power plants, and federally regulated commercial airplanes. Because there are currently no restrictions under the act on agencies accepting an ID that is not compliant with the act (typically one marked "not for federal identification") for other purposes, such an ID is acceptable for verification of identity/statement of educational purpose. It must be a government-issued ID that has not expired and includes the student's photo and name.

Online notary services

Currently the Department does not authorize the use of online notary services as an alternative to traditional, inperson notary services.

Parent remarriage after applying

While the applicant does not typically update household size or number in college because of a change in his marital status, if he is a dependent student and his parent remarries between application and verification, he must update household size to include the new stepparent. However, the student would not count the new stepparent's income and assets. A school can use professional judgment to include the stepparent's income or to otherwise account for the change.

HEA Sec. 475(f)(3) 34 CFR 668.55(b) Students must also sign (it must be a "wet" signature) a statement of educational purpose that certifies who they are and that the federal student aid they may receive will only be used for educational purposes and for the cost of attending the school for the 2019–2020 year. Unlike the other text at the end of the chapter, the text for this statement is not suggested—you must use the exact language given (the student's identification number is optional though if collected elsewhere on the same page as the statement). After examining the statement, you may convert it into an electronic record. You must keep that or the original for at least the required Title IV record retention period.

A student who is unable to appear at your school must go to a notary public and sign the statement of educational purpose. He must then submit to your office that statement (again, with the "wet" signature), a certification from the notary that he appeared before her and presented a government-issued photo ID confirming his identity, and a copy of the same ID.

UPDATING INFORMATION

Generally, a student cannot update information that was correct as of the date the application was signed because the FAFSA is considered to be a "snapshot" of the family's financial situation as of that date. For example, if the student's family sold some stock after she signed the FAFSA and spent the money on an unreported asset such as a car, she can't update her information to show a change in assets. After the FAFSA is signed, only certain items can be updated under the following conditions:

- 1. All applicants whose dependency status changes must update that and the related FAFSA information throughout the award year except when the update is due to the student's marital status changing.
- 2. All applicants selected by the Department or a school for verification of household size or number in college must update those numbers to be correct as of the date of verification unless the update is due to a change in the student's marital status. Documenting household size or number in college is not required in a subsequent verification in the same year if the information has not changed.

At your discretion you may update under either 1 or 2 even when the update is due to a change in the student's marital status if you deem it necessary to address an inequity or to reflect more accurately the applicant's ability to pay. Such a decision must be on a case-by-case basis, and you must document your reasons for it. You must also update all other pertinent information, such as spousal income and taxes paid, to be consistent with the new marital status. Do this first if the student is selected for verification, and then complete verification of the updated application. If you change the status of an applicant to unmarried and that makes him dependent (because he was independent only due to marriage), his FAFSA must be updated with his parents' information. Your school may have a policy of not considering such updates after a specific census date.

Note, however, that you cannot update the marital status of an already independent student whose dependency status has not changed because of her marriage or divorce and who was not selected for verification. In such a case you must select the student for verification if you want to exercise your discretion to update her marital status and all other associated information.

Interim disbursements

34 CFR 668.58

CORRECTING ERRORS

As explained in the last section, you only make updates in specified situations, but for students who are not selected for verification, you or they must correct and submit for processing any errors reported on the original FAFSA that would change the EFC or that determine the students' eligibility for aid.

For students who are selected for verification and receiving subsidized student aid, changes that result to any non-dollar item and to any dollar item of \$25 or more must be submitted for processing. See the section on changes in a selected applicant's FAFSA.

INTERIM DISBURSEMENTS

Interim disbursements are allowed either prior to completing verification or after verification but before receiving the corrected SAR or ISIR. If you have no reason to question the accuracy of the information on the FAFSA, prior to completing verification you may at your discretion

- 1. make one disbursement of Pell and FSEOG funds for the applicant's first payment period;
- 2. permit FWS employment for the first 60 consecutive days after the student enrolls for the award year; or
- 3. originate but not disburse a Direct Subsidized Loan.

If verification results in changes to the FAFSA information that you determine will not alter award amounts, you may at your discretion take actions 1-3 as well as disburse a Direct Subsidized Loan prior to receiving the corrected valid SAR or ISIR.

Overpayments from interim disbursements

If prior to verification you make an interim disbursement of Pell or FSEOG funds, your school is liable for any overpayment that results. If you can't eliminate it by reducing subsequent disbursements or having the student return the money, your school must use its own funds to reimburse the appropriate program by the earlier of 60 days after the student's last day of attendance or the last day of the award year.

If prior to verification your school permits provisional FWS employment of students for up to 60 days, it is liable for any overpayment it can't recover by adjusting other aid, and it must reimburse the FWS account from its own funds. Students must be paid for all work performed out of your school's payroll account—they can't be required to repay FWS wages earned except when they are proven guilty of fraud.

Schools that can't make interim disbursements

Schools on the Heightened Cash Monitoring 2 (HCM2) and Reimbursement payment methods (see Volume 4) must, as part of their request for Title IV funds from the Department, submit documentation showing that students were eligible to receive the funds disbursed to them (and for which the schools are seeking reimbursement). Because final determination of student eligibility includes completing verification, HCM2 and reimbursement schools are not able to make interim disbursements.

Recovery of funds from interim disbursements

34 CFR 668.61

Delaying disbursements

When schools choose to verify an item other than those the Department selects, they may delay disbursing Title IV aid until verification is completed if the school-selected item can affect the student's Title IV eligibility, such as an item about dependency status. But schools cannot delay disbursing when the item has no bearing on Title IV aid, for example, if the school is verifying home equity to determine student eligibility for its own or state aid.

Changes to FAFSA information

34 CFR 668.59

When there is an overaward from a regular disbursement, the following individual progam regulations apply: Pell Grants: 34 CFR 690.80

FSEOG: 34 CFR 673.5(f)

Subsidized DL: 34 CFR 685.303(e)

If you make an interim disbursement after completing verification but prior to receiving a correct valid SAR or ISIR, and you fail to receive the SAR or ISIR within the deadlines discussed later in this chapter, your school must use its own funds to reimburse the appropriate program and ensure that the student is paid under its own payroll account for all work performed.

CHANGES IN A SELECTED APPLICANT'S FAFSA

To receive subsidized student aid, students or the school must submit for processing any changes resulting from verification to a non-dollar item or a single dollar item of \$25 or more. Also, if you are required to submit *any* change through CPS because of verification, you must submit *all* changes, including amounts that are below \$25.

Campus-Based and DL changes

When students receive subsidized student aid other than Pell Grants and there is a change, adjust the package on the basis of the EFC on the corrected valid SAR or ISIR. If there was an interim disbursement, comply with the relevant rules if the package must be reduced. If there was a regular disbursement and the package must be reduced, comply with FSEOG overpayment rules or with the rules for dealing with excess loan proceeds for Direct Subsidized Loans.

Pell changes

When the data on the FAFSA change, recalculate the student's Pell Grant on the basis of the EFC on the corrected valid SAR or ISIR. You can only pay an increased Pell Grant if you have that output document and it supports an increased Pell award.

If the Pell Grant is reduced and the student received an interim disbursement, adjust following disbursements as necessary. Failing that, the student should reimburse the Pell Grant Program, or, if he does not return the overpayment, your school must reimburse the Pell program with its funds. If the student received Pell Grant money as a regular disbursement, he is responsible for repaying the overpayment. See *Volume 5*, *Chapter 1* of the Handbook for information on overpayments.

Selection after disbursement

A student's application might be selected for verification after corrections are submitted and the student has been paid based on the previous unselected CPS transaction. You must verify his application before making further disbursements. If verification does not justify aid already disbursed, then the student is responsible for repaying all aid for which he is not eligible, though he may keep any Direct Loan money he received and FWS wages he earned. See page 94 for what happens if he fails to complete verification.

After documentation is complete

When you've obtained all necessary verification documents from the student, you should compare them to the SAR or ISIR you are reviewing for payment. If all the student's information is correct and there are no outstanding issues or conflicting information, you may award and disburse aid for which the student is eligible.

Disbursing unsubsidized aid

For students who are selected for Verification Group V1, a school may, on a case-by-case basis and with proper documentation, disburse Direct Unsubsidized and PLUS loans prior to completing verification when completion will be delayed and the student is eligible for both subsidized and unsubsidized aid. To avoid exceeding the student's financial need, the school must consider the subsidized aid she will receive and adjust the aid amounts after verification if necessary.

If the student never completes V1 verification, the Direct Unsubsidized and PLUS loan aid that was disbursed may be kept. If it's determined that the student was ineligible when she received aid, see the relevant guidance on returning aid in such situations in *Volume* 4, *Chapter 3*, of the Handbook.

HOW TO SUBMIT CORRECTIONS AND UPDATES

Corrections and updates can be submitted by the student on the SAR or the web or by the school using FAA Access to CPS Online or the Electronic Data Exchange (EDE). In addition to the following information, see also "Corrections and Updates" in the 2019–2020 *ISIR Guide*.

Using fafsa.gov

Any student who has an FSA ID—regardless of how he originally applied—may correct any of his own data by using https://fafsa.ed.gov. If dependent students need to change parental data, a parent must either sign electronically with her own FSA ID or print out and sign a signature page.

Submitting changes via FAA Access to CPS Online or EDE

Your school can submit corrections and updates electronically through FAA Access to CPS Online or EDE even if the original application wasn't submitted with that method. If your school isn't listed on the transaction you want to correct, the student will have to give you the DRN printed on the SAR or SAR Acknowledgement so that you can add your school in the next available institution field and then get electronic access to the resulting corrected transaction. If all the fields are filled, the student will have to tell you which school to replace with yours.

If you send a correction or update for a student, you must first have signed documentation from the student and parent. This can be signatures on Part 2 of the SAR, a signed copy of the correction or update, or a signed verification document. Unlike those for the original application, these do not have to be wet signatures. See *Chapter 2* for more on signature requirements.

The CPS will process the change, send an ISIR to the school, and send the student a one-page SAR acknowledgement or, if the CPS has her email address, an email with a link to her SAR information on the web.

Using the SAR to make corrections

Students who received a paper SAR may make corrections or updates on it, then sign and return it to the FAFSA processor at the address given at the end of the SAR (of course, students with FSA IDs can instead use fafsa.gov). One parent must also sign if the student is dependent and parent data was changed, unless the only corrections are to the institution or housing codes, the address, or telephone number.

If the student applied electronically through a school or received an email link to SAR information on the web but would like to make corrections with a paper SAR, she can have one mailed to her by calling the FSAIC at 1-800-433-3243 and providing her name, SSN, and date of birth.

Adding schools and changing a student's address

As with other changes, a student can add schools or change her address, email address, or telephone number online or on a paper SAR. But she can also update these items over the phone by calling 1-800-4-FED-AID and providing her DRN. You can submit those changes for her through FAA Access to CPS Online, although, as noted before, if your school was not listed on the student's application, you will need her DRN to add your school.

Example: selection after disbursement

Owen is attending Guerrero University. His application isn't selected for verification, and he receives aid in the fall. In December, Owen submits a correction on his SAR that causes the ensuing transaction to be selected for verification. The aid administrator at Guerrero tells Owen he needs to submit verification documents if he wants his aid for the spring and if he wants to keep the Pell funds he received for the fall, but Owen doesn't turn in the documents. Owen doesn't have to repay the Stafford loan he got in the fall, but he does have to return the Pell Grant, and Guerrero must cancel his aid package for the spring.

Making corrections and updates

fafsa.gov

FAA Access to CPS Online https://faaaccess.ed.gov/ or via EDE by the school aid office

Student aid report

paper corrections sent by mail

By phone

Change schools listed or student address (DRN required) Federal Student Aid Information Center (FSAIC) 1-800-4-FED-AID (1-800-433-3243)

Corrections by phone limited to processor errors

As we've discussed, a student with a DRN can change his address and school listings by calling the Federal Student Aid Information Center.

Most other corrections can't be made over the phone—they have to be done on the SAR or through fafsa.gov or FAA Access. There is only one exception, and that's when the information the student submitted on a paper FAFSA or SAR was not scanned or input correctly.

If a student contacts the FSAIC and an operator can verify by viewing the image file of the document that an answer to an item was not correctly recorded by the FAFSA processor, the operator can correct that error.

The correction will be transmitted to the CPS, a corrected ISIR will be available to the student's schools within 72 hours, and he will receive a corrected SAR in the mail within 10 days. The student doesn't have to sign for this correction because he has already signed the original paper document that has the correct information.

Failure to submit documentation

34 CFR Pell Grants 668.60(c) 34 CFR Campus-Based/DL 668.60(b)

Verification completed within additional time period for Pell 34 CFR 668.60(c)(1)

The FAFSA has limited space for a student to list schools that will receive the application data: four schools can appear on the paper application, 10 with either fafsa.gov, FAA Access, or EDE. If the student wants information sent to more schools, he can use any of the methods listed previously to replace some or all of the original schools, though the replaced schools will not receive an ISIR. For example, if the student originally listed 10 schools on the application and then used fafsa.gov to replace two schools with two new ones, those that were replaced would not receive an ISIR from this correction or any subsequent correction on which they did not appear.

DEADLINES AND FAILURE TO SUBMIT DOCUMENTATION

You must require students selected for verification—either by your school or the Department—to submit the documentation by the date specified by your school (for Campus-Based and DL) or the Department (for Pell).

Campus-Based and DL

If a student doesn't provide verification documentation within a reasonable time period that your school has established, you cannot

- disburse more FSEOG funds,
- · employ or permit further FWS employment, or
- originate or disburse any additional Direct Loans (subsidized, unsubsidized, or PLUS).

The student must repay any FSEOG funds she received that year.

If she fails to complete verification within the time period established by your school and if you received any Direct Subsidized Loan funds for the student that you did not disburse, you must return some or all of those funds under the excess cash tolerance regulation [see 34 CFR 668.166(b) and *Volume 4*, *Chapter 1*].

Notwithstanding this, if the student provides the documentation after your school's deadline, you may, at your discretion, still provide aid.

Pell Grants

A student selected for verification may submit a valid SAR or a school can receive a valid ISIR after the Pell deadline but before the verification deadline published in the *Federal Register*. If a student does not provide the verification documentation or you do not receive the valid SAR or ISIR (if necessary) within this additional time, he forfeits his Pell Grant for the award year and must return any Pell money already received for that year.

Other considerations

The Department may determine not to process the FAFSA of an applicant who has been requested to provide documentation until he does so or the Department decides there is no longer a need for it.

A Pell applicant selected for verification must complete the process by the deadline published in the *Federal Register*. The <u>notice for 2018–2019</u> was published on December 4, 2018, and the deadline for that year is

September 21, 2019, or 120 days after the last day of the student's enrollment, whichever is earlier. When the notice for 2019–2020 is published, the corresponding deadline date is expected to be September 19, 2020. Campus-Based and Stafford Loan applicants must complete verification by the same deadline or by an earlier one your aid office establishes.

Verification is complete when you have all the requested documentation and a valid ISIR or SAR (one on which all the information is accurate and complete). This includes any necessary corrections, which must be made by the *Federal Register* deadlines for submitting paper or electronic corrections.

Late disbursements

Generally a student ceases to be eligible for aid once he has finished the term and is no longer enrolled. However, he may submit verification documentation and receive a late disbursement after that time if the Department processed a SAR or ISIR with an official EFC while he was still enrolled. For information on *post-withdrawal* disbursements, see *Volume 5*.

Verification status codes

When you disburse a Pell Grant, you must report the student's verification status through Common Origination and Disbursement (COD) even if he wasn't selected for verification.

- V—You have verified the student. This includes students selected by the CPS and those your school chose to verify based on its own criteria.
- W—The student was selected for verification by the CPS or your school, and you chose to pay a first disbursement of Pell without documentation. This code must be updated once verification is complete, or COD will reduce the Pell Grant to zero. In April 2019 messages were sent to schools that still reported a "W" status code for 2018–2019 student records warning that disbursements made in these cases would be considered overawards and reduced to \$0. Of course, some of these students might not yet have reached the verification deadline, in which case schools can resubmit their disbursement record. See the April 12 announcement.
- S—The CPS selected the student for verification, but you did not verify him because he satisfied one of the exclusions described earlier in the chapter (except the post-enrollment exclusion; see "Blank" next).
- Blank—Report a blank if you have not performed verification for other reasons, i.e., because neither the CPS nor your school selected the student or because the student was selected by the CPS after ceasing to be enrolled at your school and all (including late) disbursements were made. A blank also applies when you disbursed aid on an initial transaction not selected for verification, a later transaction is selected, and the student never completes verification.

Late disbursements 34 CFR 668.164(q)

Further verification?

Sometimes schools ask if further verification is needed to resolve discrepancies between the ISIR and what the student provided for verification. The answer is no, unless you have reason to doubt the accuracy of the verification information. Acceptable documentation either confirms that an item was right on the ISIR, or it is used to correct that item. That is the purpose of verification; continued fact-finding is not necessary.

SUGGESTED VERIFICATION TEXT

We are providing suggested text for the 2019–2020 verification items that were identified in the March 28, 2018, *Federal Register* notice and in Dear Colleague Letter GEN-18-03. This suggested text fulfills verification requirements, but schools do not have to use it, except as noted below. Instead, they may develop and use their own (or someone else's) text, forms, documents, statements, and certifications that are specific to the items required to be verified for a particular student or group of students. However, schools must not put the seal of the Department of Education on any verification documents.

The one exception is that schools must use the exact language provided in the "Statement of Educational Purpose" for students who are placed in verification tracking groups V4 or V5. This does not include the accompanying notary's certificate of acknowledgment; for that the school may use some other form, such as the one its state uses.

For more information, including copies of the suggested text, see the <u>electronic announcement of June 8, 2018</u>, on the IFAP website.

Verification of 2017 Income Information for Student Tax Filers

Important Note: The instructions below apply to the student and spouse, if the student is married. Notify the financial aid office if the student or spouse filed separate IRS income tax returns for 2017 or had a change in marital status after December 31, 2017.

Instructions: Complete this section if the student and spouse <u>filed or will file</u> a 2017 IRS income tax return(s). The best way to verify income is by using the IRS Data Retrieval Tool (IRS DRT) that is part of FAFSA on the Web at <u>FAFSA.gov</u>. In most cases, no further documentation is needed to verify 2017 income information that was transferred into the student's FAFSA using the IRS DRT if that information was not changed.

Check the box that applies:
The student <u>has used</u> the IRS DRT in <i>FAFSA on the Web</i> to transfer 2017 IRS income tax return information into the student's FAFSA.
The student <u>has not yet used</u> the IRS DRT in <i>FAFSA on the Web</i> , but will use the tool to transfer 2017 IRS income tax return information into the student's FAFSA.
The student is <u>unable or chooses not to use</u> the IRS DRT in <i>FAFSA on the Web</i> , and instead will provide the school with a 2017 IRS Tax Return Transcript(s) .
A 2017 IRS Tax Return Transcript may be obtained through:
 Get Transcript by Mail – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and NOT the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request. Get Transcript Online – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and NOT the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication. Automated Telephone Request – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request. Paper Request Form – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.
If the student and spouse filed separate 2017 IRS income tax returns, the IRS DRT cannot be used and the 2017 IRS Tax Return Transcript(s) must be provided for each.
Check here if a 2017 IRS Tax Return Transcript(s) is provided. Check here if a 2017 IRS Tax Return Transcript(s) will be provided later.

Verification of 2017 Income Information for Parent Tax Filers

Important Note: The instructions below apply to each parent included in the household. Notify the financial aid office if the parents filed separate IRS income tax returns for 2017 or had a change in marital status after December 31, 2017.

Instructions: Complete this section if the parents <u>filed or will file</u> a 2017 IRS income tax return(s). The best way to verify income is by using the IRS Data Retrieval Tool (IRS DRT) that is part of FAFSA on the Web at <u>FAFSA.gov</u>. In most cases, no further documentation is needed to verify 2017 income information that was transferred into the student's FAFSA using the IRS DRT if that information was not changed.

Check the box that applies:
The parents <u>have used</u> the IRS DRT in <i>FAFSA on the Web</i> to transfer 2017 IRS income tax return information into the student's FAFSA.
The parents <u>have not yet used</u> the IRS DRT in <i>FAFSA on the Web</i> , but will use the tool to transfer 2017 IRS income tax return information into the student's FAFSA.
The parents are <u>unable or choose not to use</u> the IRS DRT in <i>FAFSA on the Web</i> , and instead will provide the school with a 2017 IRS Tax Return Transcript(s) .
A 2017 IRS Tax Return Transcript may be obtained through:
 Get Transcript by Mail – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript by Mail." Make sure to request the "Return Transcript" and NOT the "Account Transcript." The transcript is generally received within 10 business days from the IRS's receipt of the online request. Get Transcript Online – Go to www.irs.gov, click "Get Your Tax Record." Click "Get Transcript Online." Make sure to request the "Return Transcript" and NOT the "Account Transcript." To use the Get Transcript Online tool, the user must have (1) access to a valid email address, (2) a text-enabled mobile phone (pay-as-you-go plans cannot be used) in the user's name, and (3) specific financial account numbers (such as a credit card number or an account number for a home mortgage or auto loan). The transcript displays online upon successful completion of the IRS's two-step authentication. Automated Telephone Request – 1-800-908-9946. Transcript is generally received within 10 business days from the IRS's receipt of the telephone request. Paper Request Form – IRS Form 4506T-EZ or IRS Form 4506-T. The transcript is generally received within 10 business days from the IRS's receipt of the paper request form.
If the parents filed separate 2017 IRS income tax returns, the IRS DRT cannot be used and the 2017 IRS Tax Return Transcript(s) must be provided for each.
Check here if a 2017 IRS Tax Return Transcript(s) is provided. Check here if a 2017 IRS Tax Return Transcript(s) will be provided later.

Verification of 2017 Income Information for Individuals with Unusual Circumstances Individuals Granted a Filing Extension by the IRS

An individual who is required to file a 2017 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2017, must provide:

- A copy of IRS Form 4868, "Application for Automatic Extension of Time to File U.S. Individual Income Tax Return," that was filed with the IRS for tax year 2017;
- A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2017;
- Verification of Non-filing Letter (confirmation that the tax return has not yet been filed) from the IRS or other relevant tax authority dated on or after October 1, 2018;
- A copy of IRS Form W–2 for each source of employment income received or an equivalent document for tax year 2017 and,
- If self-employed, a signed statement certifying the amount of the individual's Adjusted Gross Income (AGI) and the U.S. income tax paid for tax year 2017.

Individuals Who Filed an Amended IRS Income Tax Return

An individual who filed an amended IRS income tax return for tax year 2017 must provide a signed copy of the 2017 IRS Form 1040X, "Amended U.S. Individual Income Tax Return," that was filed with the IRS or documentation from the IRS that include the change(s) made by the IRS, in addition to one of the following:

- IRS DRT information on an ISIR record with all tax information from the original tax return; or
- A 2017 IRS Tax Return Transcript (that will only include information from the original tax return and does not have to be signed), or any other IRS tax transcript(s) that includes all of the income and tax information required to be verified.

Individuals Who Were Victims of IRS Tax-Related Identity Theft

An individual who was the victim of IRS tax-related identity theft must provide:

- A Tax Return DataBase View (TRDBV) transcript obtained from the IRS, or any other IRS tax transcript(s) that includes all of the income and tax information required to be verified; and
- A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS is aware of the tax-related identity theft.

Individuals Who Filed Non-IRS Income Tax Returns

- A tax filer who filed an income tax return with Guam, the Commonwealth of the Northern Mariana Islands, the Commonwealth of Puerto Rico and the U.S. Virgin Islands may provide a signed copy of his or her income tax return that was filed with the relevant tax authority. However, if we question the accuracy of the information on the signed copy of the income tax return, the tax filer must provide us with a copy of the tax account information issued by the relevant tax authority before verification can be completed.
- A tax filer who filed an income tax return with the tax authority for American Samoa must provide a copy of his or her tax account information.
- A tax filer who filed an income tax return with tax authorities not mentioned above, i.e. a foreign tax authority, and who indicates that he or she is unable to obtain the tax account information free of charge, must provide documentation that the tax authority charges a fee to obtain that information, along with a signed copy of his or her income tax return that was filed with the relevant tax authority.

Verification of 2017 Income Information for Student Nontax Filers

The instructions and certifications below apply to the student and spouse, if the student is married. Complete this section if the student and spouse will not file and <u>are not required</u> to file a 2017 income tax return with the IRS.

Check the box that applies:		
The student and spouse were not employed a	nd had no income earned	from work in 2017.
The student and/or spouse were employed in employers, the amount earned from each employer an equivalent document is provided. [Provide of student and spouse by their employers]. List evissue an IRS W-2 form. If more space is needed, provide a separate page the top.	oyer in 2017, and whether a opies of all 2017 IRS W-2 t very employer even if the e	an IRS W-2 form or forms issued to the mployer did not
the top.		
Employer's Name	IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2017
(Example) ABC's Auto Body Shop	Yes	\$4,500.00
Total Amount of Inc	ome Earned From Work	\$
Provide documentation from the IRS or other relevant 2018 that indicates a 2017 IRS income tax return was authority.	s not filed with the IRS or o	
Check here if confirmation of nonfiling is provided Check here if confirmation of nonfiling will be provided to the confirmation of nonfiling is provided to the confirmation of nonfiling is provided to the confirmation of nonfiling is provided to the confirmation of nonfiling will be provided to the confirmation of the confirmation of the confi		

Verification of 2017 Income Information for Parent Nontax Filers

The instructions and certifications below apply to each parent included in the household. Complete this section if the parents will not file and <u>are not required</u> to file a 2017 income tax return with the IRS.

Check the box that applies:			
Neither parent was employed, and i	neither had inc	ome earned from work	in 2017.
One or both parents were employed employers, the amount earned from an equivalent document is provided. parents by their employers]. List ever W-2 form. If more space is needed, provide a second content of the parents were employed.	each employer [Provide copie ry employer ev	in 2017, and whether and so of all 2017 IRS W-2 for the employer did n	n IRS W-2 form or orms issued to the ot issue an IRS
the top.			
Employer's Name		IRS W-2 or an Equivalent Document Provided?	Annual Amount Earned in 2017
(Example) ABC's Auto Body Shop		Yes	\$4,500.00
Total Am	ount of Income	Earned From Work	\$
Provide documentation from the IRS or oth 2018 that indicates a 2017 IRS income tax authority.			
Check here if confirmation of nonfiling Check here if confirmation of nonfiling		ed later.	

Number of Household Members and Number in College (Independent Student)

Number of Household Members: List below the people in the student's household. Include:

- The student.
- The student's spouse, if the student is married.
- The student's or spouse's children if the student or spouse will provide more than half of the children's support from July 1, 2019, through June 30, 2020, even if a child does not live with the student.
- Other people if they now live with the student and the student or spouse provides more than half of the other person's support, and will continue to provide more than half of that person's support through June 30, 2020.

Number in College: Include in the space below information about any household member who is, or will be, enrolled <u>at least half time</u> in a degree, diploma, or certificate program at an eligible postsecondary educational institution any time between July 1, 2019, and June 30, 2020, and include the name of the college.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship	College	Will be Enrolled at Least Half Time (Yes or No)
		Self		

Note: We may require additional documentation if we have reason to believe that the information regarding the household members enrolled in eligible postsecondary educational institutions is inaccurate.

Number of Household Members and Number in College (Dependent Student)

Number of Household Members: List below the people in the parents' household. Include:

- The student.
- The parents (including a stepparent) even if the student doesn't live with the parents.
- The parents' other children if the parents will provide more than half of the children's support from July 1, 2019, through June 30, 2020, or if the other children would be required to provide parental information if they were completing a FAFSA for 2019–2020. Include children who meet either of these standards, even if a child does not live with the parents.
- Other people if they now live with the parents and the parents provide more than half of the other person's support, and will continue to provide more than half of that person's support through June 30, 2020.

Number in College: Include in the space below information about any household member, excluding the parents, who is, or will be, enrolled <u>at least half time</u> in a degree, diploma, or certificate program at an eligible postsecondary educational institution any time between July 1, 2019, and June 30, 2020, and include the name of the college.

If more space is needed, provide a separate page with the student's name and ID number at the top.

Full Name	Age	Relationship	College	Will be Enrolled at Least Half Time (Yes or No)
		Self		

Note: We may require additional documentation if we have reason to believe that the information regarding the household members enrolled in eligible postsecondary educational institutions is inaccurate.

High School Completion Status

Provide <u>one</u> of the following documents to indicate the student's high school completion status when the student begins college in 2019–2020:

- A copy of the student's high school diploma.
- For students who completed secondary education in a foreign country, a copy of the "secondary school leaving certificate" or other similar document.
- A copy of the student's final official high school transcript that shows the date when the diploma was awarded.
- A State certificate or transcript received by a student after the student passed a Stateauthorized examination that the State recognizes as the equivalent of a high school diploma (GED test, HiSET, TASC, or other State-authorized examination).
- An academic transcript that indicates the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree.
- For a student who was homeschooled in a State where State law requires the student to obtain a secondary school completion credential for homeschooling (other than a high school diploma or its recognized equivalent), a copy of that credential.
- For a student who was homeschooled in a State where State law does not require the student to obtain a secondary school completion credential for homeschooling (other than a high school diploma or its recognized equivalent), a transcript, or the equivalent, signed by the student's parent or guardian, that lists the secondary school courses the student completed and includes a statement that the student successfully completed a secondary school education in a homeschool setting.

A student who is unable to obtain the documentation listed above must contact the financial aid office.

2019–2020 Required Verification Text (Note: Institutions must use the exact language in the Statement of Educational Purpose as provided below)

Identity and Statement of Educational Purpose (To Be Signed at the Institution)

Texto de verificación requerida para 2019–2020 (Nota: Las instituciones deben utilizar el lenguaje exacto en la Declaración de Propósito Educativo que se presenta a continuación)

Verificación de Identidad y Declaración de Propósito Educativo (Para ser firmadas en la institución)

El estudiante debe comparecer en persona en para (Nombre de la institución educativa postsecundaria)
verificar su identidad mediante la presentación de una identificación con fotografía (ID) válida emitida por el gobierno que no haya expirado, como una licencia de conducir, otro tipo de identificación emitida por el estado o pasaporte, entre otros. La institución conservará una copia de la identificación con fotografía del estudiante en la cual se anotará la fecha en la que se recibió y revisó, y el nombre del funcionario de la institución autorizado a recibir y revisar las identificaciones de los estudiantes.
Además, el estudiante debe firmar, en presencia del funcionario de la institución, la Declaración de Propósito Educativo proporcionada a continuación.
Verificación de Identidad y Declaración de Propósito Educativo (Para ser firmadas en presencia de un notario)
Si el estudiante no es capaz de comparecer en persona en
(Nombre de la institución educativa postsecundaria) para verificar su identidad, el mismo debe proporcionar a la institución:
(a) una copia de la de identificación con fotografía (ID) válida emitida por el gobierno que no haya expirado, que se reconoce en la declaración del notario que aparece a continuación, o que se presenta ante un notario, como una licencia de conducir, otro tipo de identificación emitida por el estado o pasaporte, entre otros; y
(b) la Declaración de Propósito Educativo original proporcionada a continuación debe ser notarizada. Si la declaración del notario aparece en una página separada de la Declaración de Propósito Educativo, se debe indicar de manera clara que la Declaración de Propósito Educativo era el documento notarizado.
Declaración de Propósito Educativo
Certifico que yo,, soy el individuo que firma esta [Imprimir nombre del estudiante]
Declaración de Propósito Educativo, y que la ayuda financiera federal estudiantil que yo pueda recibir sólo será utilizada para fines educativos y para pagar el costo de asistir a para 2019–2020. [Imprimir nombre de institución educativa postsecundaria]
[Firma del estudiante] [Fecha]
[Número de identificación del estudiante]

Sample of a Notary's Certificate of Acknowledgement Notary's certification may vary by State

State of			
City/County of			
On	, before me,		
(Date)		(Notary's name)	
personally appeared,			, and proved to me
	(Printed name of signer)		
on the basis of satisfa	ctory evidence of identific	cation	
		(Type of unexpired gov	ernment-issued photo
		ID provided)	
to be the above-name	ed person who signed the	foregoing instrument.	
WITNESS my hand a	ınd official seal		
(seal)	<u>-</u>		
		(Notary sign	ature)
My commission expire	es on		
	(Date)		

Certification and Signature (Independent Student)

Certification and Signature

Each person signing below certifies that all of the information reported is complete and correct.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

Print Student's Name	Student's ID Number	
Student's Signature (Required)	Date	
Spouse's Signature (Optional)	 Date	

Certifications and Signatures (Dependent Student)

Certifications and Signatures

Each person signing below certifies that all of the information reported is complete and correct. The student and one parent whose information was reported on the FAFSA must sign and date.

WARNING: If you purposely give false or misleading information, you may be fined, sent to prison, or both.

Print Student's Name	Student's ID Number
Student's Signature	Date
3	
Parent's Signature	Date